

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORY OF VAL-PAK DIRECT MARKETING
SYSTEMS, INC. AND VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T24-1)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc.: VP/USPS-T24-1, filed on October 2, 2001.

Interrogatory VP/USPS-T24-1 was redirected to witness Schenk.

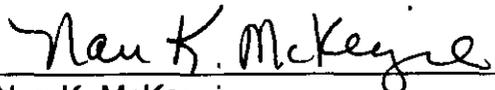
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Nan K. McKenzie

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October 16, 2001

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TO AN INTERROGATORY OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.

VP/USPS-T24-1. a. Please state whether you and/or the Postal Service have studied empirically, modeled separately, or otherwise estimated a separate unit cost for carriers to case saturation Standard ECR mail when such mail consists of:

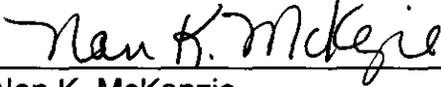
- i. Letters;
 - ii. Enveloped flats;
 - iii. Catalogs;
 - iv. Detached Address Labels ("DALs");
 - v. Flat-shaped pieces (including any inserts) that accompany DALs;
 - vi. Periodicals that accompany DALs;
 - vii. Merchandise samples that accompany DALs; or
 - viii. Bound printed matter that accompany DALs.
- b. For each affirmative answer to the preceding part a, please indicate the estimated Base Year unit cost for carrier casing, and provide references to where such unit cost estimates can be found in your testimony, your exhibits and workpapers, or library references on which your testimony relies.
- c. For each negative answer to preceding part a, please explain why separate estimates for such unit costs have not been prepared.

RESPONSE:

- a. (i.) – (viii.) No.
- b. Not applicable.
- c. (i.) – (viii.) Cost segment 6 provides costs for all city carrier in-office activities. Separate costs for casing mail separate from other city carrier in-office activities are not available. Cost segment 10 provides the costs for all rural carrier activities. Separate costs for casing mail separate from other rural carrier are not available.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Nan K. McKenzie

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